

**Comments by Vern Goehring
California Fisheries Coalition
to the
MLPA Blue Ribbon Task Force
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Thank you Mr, Chairman and members of the Task Force, I am pleased to be able to share with you some of our preliminary thoughts on the Draft of the Master Plan Framework.

It appears to us that there is a misunderstanding regarding what a “Master Plan Framework” is or should be. Is the Framework simply a restatement of the law and the MLPA Initiative process or should it help decision making by specifying guidelines, standards and criteria that you and the FGC may use in making decisions regarding designating future MPAs?

The Draft states the Framework is “to establish and guide a process for implementing MPAs” and elsewhere, it describes itself as a “process for developing proposals..” We think the Framework should contain guidelines and standards for actually implementing the MLPA, not simply a process for doing so.

While we agree that process is important and needs to be clearly identified, the Draft is largely a paraphrase or annotation of the MLPA. However, it is not exclusively a restatement of the law. It is sprinkled with standards that will help in actually making recommendations and decisions regarding the implementation of the MLPA, (especially on page 23 regarding enforcement considerations in setting MPA boundaries).

We think the Draft reveals a fairly strong bias against fishing and a rush to establish MPAs and marine reserves by what it excludes. For example, there is almost no mention of non-fishing impacts, no requirement or guidance for considering terrestrial activities, and no requirement to collaborate with the regional Water Boards, the Coastal Commission, or the State Lands Commission to describe, quantify, and monitor these potentially significant impacts to the ocean.

There is no requirement to reexamine and redesign existing MPAs and other areas already closed to fishing. In fact on page 14, the draft states that after a preferred alternative is identified “existing MPAs may then be evaluated.” We think the intent of the Legislature and the law is clear that there is a need to redesign the current MPA system.

In addition, the draft contains no guidelines or requirements to evaluate and integrate existing fishery management practices into the MLPA program to minimize needless duplication and excessive restrictions on important economic activities. Is it unreasonable to think an early step in this process may be to overlay existing closures to see if areas with minimum fishing might also be valuable in meeting MLPA goals, thereby minimizing new MPA designations?

We have long been concerned that many key decisions would be delayed – possibly to a time when fewer people were watching. The current draft introduces the notion which I have labled ‘MSG’ – More Specific Guidance. More specific guidance will be developed in conjunction

with designating central coast MPAs, a phase of the MLPA implementation that will not likely involve all stakeholders.

Several additional concerns we have include the following:

1. We think goals and objectives required for the MLPA should include goals related to ecological concerns, species specific issues, socio-economic issues, biodiversity challenges, and many other such subjects.
2. The Framework should set standards and criteria regarding long-term funding for management, monitoring and enforcement and it should require that the size and extent of an MPA network match funding reasonably expected to be available; what happens if management and monitoring cannot be carried out; what level of minimum monitoring and enforcement should be required; and a time line for evaluating the success or failure of MPAs and reserves.
3. The draft says (pg. 15) “habitats and ecosystems that are insufficiently protected” should be identified but does not define or set standards for determining what is insufficiently protected.
4. The Framework draft reports that an earlier Master Plan Team determined that there should be four regions rather than three as specified in the MLPA. Is the Framework definitely stating there will be four regions or is this just posing a question to be resolved at some time in the future?
5. The Draft claims (pg. 17) that baseline data is needed in relation to management plans but actually we think baseline data is needed prior to designating MPAs. The Framework must required require and set standards for baseline data needs regarding: water quality, coastal development, socio/economic indicators, natural phenomenon events, as well as the status and trends of fisheries.

Once again, I thank you for this opportunity to share this preview of the draft Master Plan Framework. We will submit a more complete list of concerns and suggestions for making the Framework a truly helpful document to fully and equitably implement the MLPA.